

**IN THE UNITED STATES DISTRICT COURT  
FOR DISTRICT OF DELAWARE**

ORCA SECURITY LTD.,	)	
	)	
	)	
Plaintiff and Counter-Defendant	)	C.A. No. 23-758-JLH-SRF
	)	
v.	)	
	)	
WIZ, INC.,	)	
	)	
Defendant and Counter-Plaintiff.	)	

**WIZ, INC.'S STIPULATION CONCERNING INVALIDITY GROUNDS**

On July 1, 2024, Defendant Wiz, Inc. (“Wiz”) filed petition number IPR2024-01109 with the Patent Trial and Appeal Board requesting *inter partes* review (“IPR”) of U.S. Patent No.11,726,809 (“the ’809 patent”). The petition advances at least one ground of unpatentability against every claim of its associated patent (“Challenged Claims”).

Wiz hereby stipulates that if the Patent Trial and Appeal Board institutes an IPR on the petition filed in IPR2024-01109, then Wiz will not pursue in this case, against any of the Challenged Claims in the instituted IPR, the specific grounds advanced in the instituted IPR or any ground that reasonably could have been raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 against any of the Challenged Claims only on the basis of prior art patents or printed publications).

This stipulation is not intended and should not be construed to limit Wiz’s ability to assert invalidity of the claims of the ’809 patent on any other ground regardless of whether the IPR is instituted.

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Dated: November 6, 2024

/s/ Christine D. Haynes

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